



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GEORGE S. ELGHOSSAIN and
MONA C. ELGOSSAIN,

Plaintiffs

v.

BANK AUDI, S.A.L,
BANQUE DU LIBAN,
JOHN DOES 1-10

Defendants.

Civ. Action No. :

1:21-cv-02162-PGG-BCM

**MOTION FOR EXTENSION OF TIME
TO FILE A MOTION FOR LEAVE TO
AMEND COMPLAINT**

Dear Magistrate Judge Barbara Moses:

- 1) I am one of the two pro se Plaintiffs in this action which was filed on March 11, 2021.
- 2) I move under Rule 6(b) of the Federal Rules of Civil Procedure for extension of time to file a motion for leave to amend complaint which must be done by March 11, 2022, (**ECF 52**);
- 3) The requested extension is necessary because the financial crisis in Lebanon which gave rise to the claims made in this case is very fluid and relevant evidentiary material that must be considered and incorporated into the proposed amended complaint is coming into view almost on a daily basis,
- 4) Plaintiffs move to extend the deadline by a period of thirty (30) days from the set deadline of March 11, 2022, which barring any opposition and with the Court's approval the extended deadline would fall on April 11, 2021,

- 5) All parties agree that the remaining deadlines in the Court's order of January 26, 2022 remain unchanged.
- 6) Counsel for both defendants consent to the request as per attached email string.

Respectfully submitted,

Dated: March 9, 2022
Apex, North Carolina

PRO SE PLAINTIFFS

By: /s/ George Elghossain
George S. Elghossain
2203 Henniker Street
Apex, NC 27523-9514
Tel. 919-904-1614

SO ORDERED.

Plaintiffs' motion for leave to amend the complaint is due by **April 11, 2022**. Defendants' opposition is due by **May 11, 2022**. Plaintiffs' optional reply is due by **May 25, 2022**.



Barbara Moses
United States Magistrate Judge
March 10, 2022